



State of Wisconsin
Governor Scott Walker

TO: **Child Care Eligibility and Authorization Workers
and Supervisors
Income Maintenance Supervisors
Income Maintenance Staff
Training Staff
Child Care Coordinators**

DECE/BELP OPERATIONS MEMO

No: 18-27

DATE: 10/11/2018

Wisconsin Shares Child Care

FROM: Kath McGurk, Director
Bureau of Early Learning and Policy
Division of Early Care and Education
Department of Children and Families

SUBJECT: Wisconsin Shares Child Care Temporary Break Period for Parents

CROSS REFERENCE: [Child Care and Development Block Grant](#);
[Wisconsin Shares Child Care Policy and Process Handbook](#),
Chapter 1: Program Eligibility and Chapter 2: Authorizations;
Operations Memos: [16-20](#), [17-37](#), [17-38](#), and [17-45](#)

EFFECTIVE DATE: November 1, 2018

PURPOSE: This memo introduces the Temporary Break (TBRK) Period for parents participating in the Wisconsin Shares Child Care Subsidy Program who experience a temporary break from any approved activity.

BACKGROUND: The CCDBG Act of 2014 requires states to create family friendly policies that help families maintain Wisconsin Shares Child Care Subsidy and support continuity of care for children. The Bureau of Early Learning and Policy (BELP) has implemented these requirements in three phases. The first phase eliminated the Six Month Report Form (SMRF) for Wisconsin Shares and established a 12-month eligibility period (see OM [16-20](#)). The second phase established a \$25,000 asset test for families (see OM [17-37](#)), allows a child who reaches the age of 13 to continue receiving Wisconsin Shares up to the next annual renewal (see OM [17-38](#)), and allows parents who experience a permanent loss of an approved activity to continue receiving Wisconsin Shares for up to three months while they search for another approved activity (see OM [17-45](#)). This third phase further enhances policies to promote continuity of care and reduce fluctuations in the monthly subsidy amount.

CURRENT POLICY:**2.8 Authorizations During Temporary Absences from Employment**

Local child care agencies may authorize subsidy amounts to parents during temporary absences from employment in the following limited situations:

The parent must report the break in employment and request continuing assistance within 10 calendar days of the onset of the break. If this report is made after the tenth day, there is no eligibility for continuing child care subsidy during the temporary absence from employment, see Section 2.2.14 for ending the authorization.

- If the child is absent from child care, the child must be returning to the same child care provider after the absence.
- The parent must be receiving Wisconsin Shares child care assistance prior to and after the leave.
- The parent must be employed prior to and after the leave.
- The parent must return to work for the same employer immediately after the leave. The local agency may ask for a statement from the employer verifying that the parent will return to employment after the leave.
- If the reported break is expected to be longer than the time frame allowed, the parent will not be denied the entire time, but can only get child care for the maximum time allowed in the table below.

Child care subsidy utilized while the parent is on paid time off from work, such as for vacation time, sick time, short-term disability, or personal time off, must meet the above requirements and is limited to the time frames listed in the table below.

When the parent reports the break in employment and it meets the above requirements, the agency must schedule the authorization to end on the last day of the break, not to exceed the time frames listed in the table below.

Situation	Maximum Number of Weeks of Leave
a. Parent is temporarily laid off, but will be returning to work within 4 weeks to the same employer.	4 weeks
b. Parent has a temporary break in employment, but will return to his or her same employment within 4 weeks. (Note: this does not include situations when a parent loses employment and is seeking new employment.)	4 weeks
c. Parent must report for jury duty, but will return to work within 4 weeks to the same employer	4 weeks
d. Family vacation (allowed once per calendar year only)	2 weeks
e. Parent is on medical leave, as documented by a physician, but will be returning to work with the same employer.	6 weeks
f. Child is ill, as documented by a physician, but will be returning to the same child care provider.	6 weeks

NEW POLICY: The following new policy has been added to the Wisconsin Shares Policy and Process Handbook with an effective date of November 1, 2018.

GLOSSARY DEFINITION: Temporary Break: A parent's break from their approved activity that is expected to last a calendar month or more, but less than three (3) months. Parents must expect to return to their same approved activity after the break (see 1.3.9.3).

1.3.9.3 Temporary Break Periods

The Temporary Break period is intended to support continuity of care for the child during a parent's time-limited absence from their approved activity. Parents are required to report a temporary break from their approved activity within 10 calendar days of the onset of the break if the parent expects the break to last one (1) month or more.

Local agencies must not require parents to provide verification of a temporary break, unless it is questionable whether the parent has resumed or permanently lost the approved activity and did not report it.

1.3.9.3.1 Eligibility for a Temporary Break Period

Parents are eligible for Wisconsin Shares Child Care authorizations while being temporarily absent from their approved activity for up to three (3) months, if the parent continues to meet all financial and non-financial eligibility requirements. Parents must expect to return to their approved activity following the temporary break and must intend to continue to use child care during this period.

The TBRK period is available to parents who currently have ongoing Wisconsin Shares Child Care eligibility. Following a reported temporary break, if the parent has ongoing eligibility and intends to continue using child care, the worker must place the parent in TBRK. A parent must report a change in need if the parent does not utilize child care during their TBRK period (see 1.8.1).

Process: If the parent reports a loss of approved activity, the worker must change the parent's Approved Activity to TBRK on the Child Care Activity Status page in CARES Worker Web (CWW). CWW will automatically generate the Approved Activity Break Period letter when the worker updates the Child Care Activity Status page to TBRK.

Parents who report a temporary break and explicitly state that he or she does not intend to use child care and decline the TBRK period are not eligible for the TBRK period after declining.

The temporary break can be for reasons such as, but not limited to:

- Parent illness;
- Leave to care for a parent's family member;
- A student or holiday break;
- An interruption in work for a seasonal worker who is not working between regular industry work seasons; or
- Any other cessation as long as the individual expects to return to their same approved activity and the break does not exceed three (3) months.

Parents who are applying for initial eligibility cannot enter into a TBRK period at application. Eligible adults added later to the case through the Person Add process are also not eligible for the TBRK period at the time they are added to the case.

Parents participating in Self-Employment (see 1.3.8.3.2), who are operating at a loss (see 2.4.3.7) and choosing to take a temporary break from their self-employment are not eligible for the TBRK period.

Note: When a business is operating at a loss, the authorization at the time of the parent's break from self-employment would be zero hours and there would be no existing authorization to maintain.

Parents are not limited to a certain number of TBRK periods during the 12-month eligibility period; however, a parent must be engaged in and verify an approved activity as outlined in 1.3.8 and 1.5.11 between TBRK periods.

1.3.9.3.2 Starting and Ending a Temporary Break Period

The Temporary Break (TBRK) period will begin the month following the break in the approved activity. If the parent reports the break in the approved activity untimely, the TBRK period must be granted; however, the begin date will be backdated (see 1.3.9.2.2).

The TBRK period shall remain in place for up to three (3) months. The worker may only end the TBRK period earlier if:

- The parent resumes his or her approved activity during the TBRK period.
- The parent contacts the agency and requests that the worker end the TBRK period.
- Eligibility fails for any other financial or non-financial reason, including but not limited to, the family moving out of state or failing to cooperate with the Child Support Agency.
- Another parent in the Assistance Group reaches the end of his or her TBRK or Approved Activity Search period (ACTS) in a two-parent or three-generation family.

Example 1: Jodie begins a TBRK period on July 1 and reports resuming her approved activity on August 5. Jodie's TBRK period will end on August 4. Jodie's worker completes an authorization assessment on August 5 to determine if Jodie's authorized hours need to be adjusted.

Example 2: Sarah is in a TBRK period from January to March and her husband Daniel is in an ACTS period from February to April. If Sarah does not return to her approved activity by the end of March, eligibility will end because at that time, no parent is engaged in an approved activity.

The TBRK period can exceed the eligibility renewal date, unlike the ACTS period (where eligibility will end at renewal).

Example 3: Lucy's Assistance Group has an eligibility period from January 1 to December 31. She reports a temporary break from her job to the local agency on

October 6. Lucy's TBRK period would begin on November 1 and, as long as Lucy completes her renewal, can continue until January 31.

If eligibility fails and then reopens within one (1) calendar month, the parent may return to the existing TBRK period to utilize any remaining TBRK time. The worker must not establish a new TBRK period when the case reopens.

Process: If the parent has not resumed the approved activity at the end of the TBRK period, eligibility in CWW and the authorization in CSAW will be ended systematically. The worker is not required to take action.

1.3.9.4 Consecutive Permanent Losses or Temporary Break Periods

Approved Activity Search periods (ACTS) and Temporary Break periods (TBRK) cannot be consecutive. Parents must be engaged in and verify an approved activity as outlined in 1.3.8 and 1.5.11 between ACTS and TBRK periods

Parents cannot be in an ACTS period and then immediately follow it with a TBRK period, and conversely, parents cannot be in a TBRK period and then immediately follow it with an ACTS period.

If a parent begins a TBRK period and that temporary break status changes into a permanent loss of an approved activity, the parent may continue to use the remainder of the TBRK period to search for another approved activity if any remainder of the three (3) months is available.

1.5.12.1 Ongoing Financial Verification

If a parent reports a change in income, the worker must request verification of the income. Parents are not required to verify a loss of income from a temporary or permanent loss of approved activity.

2.4.3.5 Authorizations During a Temporary Break Period

During the Temporary Break period (TBRK), the existing authorization will remain in place at the same number of hours for up to three (3) months unless the parent reports that they do not want or need the authorization, or requests that the authorized hours are reduced.

Children who do not have authorizations in place prior to their parent's temporary break are still eligible for an authorization during the parent's TBRK period. The worker must write the authorization based on the parent's schedule and other authorization assessment information that was in place prior to the break in approved activity.

During a TBRK period, authorized hours must be reduced following an authorization assessment when a school age child goes from a summer break to the fall school year (see 2.4.2). Parents can change providers during a TBRK period in accordance with Section 2.4.9.

In a two-parent or three-generation household in which one adult is participating in a TBRK period, the local agency must maintain authorizations at the same number of

hours until all parents are again engaged and participating in approved activities, unless the parent makes a request for a reduced number of hours.

Example 1: Sally does not have an authorization in place for her school-aged child during the school year. Sally's mother goes into hospice care at the same time school lets out for the summer, and Sally takes a break from employment to care for her mother. The worker writes an authorization based on Sally's work schedule, along with other relevant authorization assessment information that was in place prior to this temporary break.

Example 2: Eliza is receiving Wisconsin Shares Child Care subsidies for her daughter, Angelica, when she goes on unpaid maternity leave from her employer. She gives birth to baby Jordan during the TBRK period. Baby Jordan is eligible for an authorization for the remainder of Eliza's TBRK period. The worker writes the authorization based on Eliza's schedule and other authorization information that was in place prior to the break in employment.

CWW SYSTEM ENHANCEMENTS: CARES Worker Web (CWW) has been enhanced to allow workers to enter "TBRK-Temporary Break" as the Activity Type on the Child Care Activity Status page for a parent who has reported the temporary break of an approved activity if the household is otherwise eligible for Wisconsin Shares Child Care. The worker must enter the Effective Month as the month following the break of the approved activity whether reported timely or untimely.

Primary Person : TONYA NEUBAUER 37F PP		Case: 315098
▶ Action Items (0)	▶ Documents (0)	▶ Discrepancies (0)
Child Care Activity Status		
Child Care Activity Details		
Individual	*Effective Month	*Activity
TONYA NEUBAUER 37F PP	12 / 2018	Y - Yes ▼
Worker Details		
? - NOT YET PROVIDED ACTS - ACTIVITY SEARCH CANT - CANT PROV CARE. CANT WORK EMGE - EMP & APPR BASIC ED EMPL - EMPLOYMENT EMTS - EMP & APPR POST SEC ED FSJS - FSET JOB SEARCH FSWE - FSET WORK EXPERIENCE OPWE - OTHER PARENT WORK EXPER TBRK - TEMPORARY BREAK TPHS - TEEN PARENT ATTD HS/EQUIV TRNJ - TRANSITIONAL JOB WWEM - W-2 Placement		

Note: A system validation will prohibit workers from entering TBRK prior to December 1, 2018 because the TBRK policy effective begin date is November 1, 2018.

Child Care Approved Activity Break Period Page:

The title of the "Child Care Activity Search Period" page has been renamed to "Child Care Approved Activity Break Period". A new field named "Period Type" has been added to display whether the break has been entered for ACTS or TBRK.

Child Care Approved Activity Break Period		Cancel	Reset
Approved Activity Break Period Information			
Last Updated:	12/01/2018		
Delete Reason:	<input type="text"/> <input type="button" value="v"/> <input type="button" value="list"/>		
Approved Activity Break Period Details			
Individual:	TONYA NEUBAUER 38F PP	Sequence:	1
Period Type:	TBRK - TEMPORARY BREAK		
Period Begin Month:	12/2018	Period End Month:	02/2019
Override Begin Month:	<input type="text"/> MM / <input type="text"/> YYYY	Override End Month:	<input type="text"/> MM / <input type="text"/> YYYY
Reason for Override:	<input type="text"/> <input type="button" value="v"/> <input type="button" value="list"/>		
Comments:	<input type="text"/> <div style="text-align: right;"> <input type="button" value="up"/> <input type="button" value="down"/> </div>		
Current Size = 0 characters (500 characters max.)			

The page does not appear in the Child Care driver flow. It is available in the Navigation Menu under the existing Child Care Activity Status page. The worker enables the page by entering either an ACTS or TBRK code in the CC Activity status page and then confirming Child Care open or closed.

This page is available for the following reasons:

- To view established Activity Search Begin and End Months;
- To delete an incorrect established Activity Search period; and
- To override the dates of an established Activity Search period.

Wisconsin Shares Approved Activity Break Period Letter:

The former "Child Care Approved Activity Search Letter" has been modified to include both TRBK and ACTS. The letter has also changed in the following ways:

- The title.
- Language was expanded to include temporary break.
- A column was added to identify the break type.

All language changes can be seen highlighted below.

Note: These changes will occur effective 10/27/2018.

Wisconsin Shares Approved Activity Break Period

One or more parents in your household reported a permanent or temporary break from their approved activity. Parents who have a permanent or temporary break from their approved activity may be eligible for a continued child care assistance period lasting up to three months.

Parents may continue to use Wisconsin Shares during their continued service period as long as the household continues to meet all other eligibility requirements. The break period will not extend past the End Date in the table below.

If more than one parent in your household is in a break period, your child care subsidy will end on the earliest End Date of the parent who is not in an approved activity.

Name	Break Type	Begin Date	End Date	Additional Information
Peter Totten	Permanent Break	03/01/2017	05/31/2017	
Molly Totten	Temporary Break	02/01/2017	04/30/2017	The begin and/or end dates of your break period have been updated.

After a worker runs and confirms eligibility, the Approved Activity Break Period letter will be generated overnight.

The system will not send the letter when the worker enters a TBRK or ACTS with begin and end months that are in the past because it is no longer effective.

If the parent does not return to or obtain another approved activity by the Break End Date, eligibility will end and an eligibility closure notice and an authorization end letter will be sent. The system will not generate another Wisconsin Shares Approved Activity letter.

CSAW SYSTEM ENHANCEMENTS: There are no CSAW system enhancements for TBRK.

CONTACTS:

For Wisconsin Shares Child Care policy questions outside of Milwaukee County contact your Bureau of Regional Operations (BRO), Child Care Coordinators at BROCCPolicyHelpDesk@wisconsin.gov.

For Child Care CARES/CWW and CSAW Processing Questions statewide, and policy questions in Milwaukee County, contact the Child Care Subsidy and Technical Assistance line at: childcare@wisconsin.gov or (608) 422-7200.